

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105



Mark Manfredi Red Hill Regional Program Director Naval Facilities Hawaii 400 Marshall Road Joint Base Pearl Harbor Hickam, Hawaii 96860

Re: Revision to Conditional Approval of Scope of Work for Destructive Testing Dated May 30, 2017 submitted to the Regulatory Agencies Pursuant to Section 5.3.2 of the Red Hill Administrative Order on Consent

Dear Mr. Manfredi:

The U.S. Environmental Protection Agency ("EPA") and Hawaii Department of Health ("DOH"), collectively the "Regulatory Agencies", are revising Condition 1 of our July 7, 2017 conditional approval for *Red Hill Bulk Fuel Storage Facility Scope of Work for Destructive Testing* submitted to the U.S. Department of Navy ("Navy") and Defense Logistics Agency ("DLA"). The remaining conditions of approval in July 7, 2017 letter remain in effect.

Condition 1 of the conditional approval shall now be:

1. The Navy and DLA shall seek concurrence from the Regulatory Agencies on the specific plan for NDE of each tank that will be part of the NDE verification described in the AOC 5.3.2 SOW. This plan should include validating the NDE measures to be used for each damage mechanism of concern (i.e. cracks, pits, general thinning, etc.). Validation in this context means establishing that the contractor performing the work for the Navy will describe and explain the basis for equipment and techniques used. Any claims of achievable performance should be supported with past performance evidence or references as well as its expected performance criteria. The contractor performing the work shall also include professional codes, standards and/or procedures that are employed, and describe any equipment calibrations and/or testing performed to confirm claimed performance, such as past performance demonstration projects or, if available, documented probabilities of detection. The contractor shall specify personnel qualifications, and any conditions employed to control and audit the specific individual's performance while the work is being performed.

As a courtesy, we have enclosed a clean, revised conditional approval letter that includes all current conditions of approval. Please let us know if you have any comments or concerns.

Sincerely,

Bob Pallarino Steven Chang, P.E.

EPA Red Hill Project Coordinator DOH Red Hill Project Coordinator

Enclosure

cc: Captain Richard D. Hayes III, Navy (via email)

John Montgomery, Navy (via email)